

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

William Reynolds, individually; as
spouse of Sylwia Pawlak Reynolds; and
as next friend of their minor children,
AMR, WR, and AR,

Plaintiff,

v.

Nancy Sanders Harper, M.D. et al.,

Defendants.

Court File No. 25-cv-754-LMP-JFD

**STIPULATION TO EXTEND
TIME TO RESPOND TO
PLAINTIFF'S AMENDED
COMPLAINT**

Plaintiff William Reynolds, Defendants Sarah Elizabeth Lucken, M.D., Seth Cheng Silbert, M.D., Mohamed Tabsin A. Jouhari, M.D., and Hennepin Healthcare System, Inc. (“HHS Defendants”), Defendants Hennepin County and Britta Nicholson (“County Defendants”), and Defendant The Board of Regents of the University of Minnesota (“University of Minnesota”), by and through their respective counsel, hereby stipulate and agree to the following:

1. WHEREAS, Plaintiff filed this action on February 27, 2025;
2. WHEREAS, Plaintiff filed an Amended Complaint on March 31, 2025;
3. WHEREAS, the Court may extend the time to answer or otherwise respond to the Complaint for good cause, *see* Fed. R. Civ. P. 6(b);
4. WHEREAS, counsel for Plaintiff and respective counsel for Defendants met and conferred on issues related to waiver of service of the Amended Complaint and the

time for Defendants herein to respond to Plaintiff's Amended Complaint, and the parties have agreed to cooperate on these issues;

5. WHEREAS, Defendant University of Minnesota executed a waiver of service on April 29, 2025 (ECF No. 11);

6. WHEREAS, the HHS Defendants executed waivers of service on May 29, 2025 (ECF Nos. 15-18);

7. WHEREAS, the County Defendants executed waivers of service on May 29, 2025 (ECF Nos. 13-14);

8. WHEREAS, counsel for Plaintiff, HHS Defendants, County Defendants, and Defendant University of Minnesota agree that the deadline for HHS Defendants, County Defendants, and Defendant University of Minnesota to answer or otherwise respond to Plaintiff's Amended Complaint may be extended until August 1, 2025;

9. WHEREAS, good cause exists to extend the deadline because Defendants need additional time to meaningfully answer or otherwise respond to Plaintiff's Amended Complaint, which is 113 pages long and asserts nine causes of action on behalf of five plaintiffs against multiple defendants;

10. WHEREAS, the undersigned defense counsel have significant caseloads, including the following pertinent deadlines:

- Counsel for the County Defendants is preparing for a week-long federal trial scheduled for the week of June 23-27 (Court File No. 22-cv-352-SRN/DJF);

- Counsel for HHS Defendants and County Defendants must file Rule 12 motion documents in a federal civil rights action by June 26, 2025 (Court File No. 25-cv-906-DSD/DTS);

11. WHEREAS, two federal holidays, Juneteenth and Independence Day, occur prior to the current July 7 deadline for the County and HHS Defendants; and

12. WHEREAS, an additional 32 days for Defendant University of Minnesota and an additional 25 days for HHS Defendants and County Defendants will not have a significant impact on the scheduling of this case because no scheduling order has been issued yet, and the parties seek approval of the extension well in advance of the applicable deadlines.

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED by and between the parties to this Stipulation that the Court may enter an Order that states that the HHS Defendants, County Defendants, and Defendant University of Minnesota shall answer or otherwise respond to Plaintiff's Amended Complaint on or before August 1, 2025.

STIPULATED TO BY:

Dated: June 4, 2025

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/s/Jerome M. Reinan

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For the HHS Defendants:

Dated: June 4, 2025

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For the County Defendants:

Dated: June 4, 2025

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For Defendant University of Minnesota:

Dated: June 4, 2025

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